

EXHIBIT 3

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION

3 MELODY JOY CANTU and DR.)
RODRIGO CANTU ,)
4)
 Plaintiffs,)
5) CIVIL ACTION
VS.)
6) NO.: 5:20-CV-00746-JKP
DR. SANDRA GUERRA and) (HJB)
7 DIGITAL FORENSICS)
CORPORATION, LLC,)
8)
 Defendants.)

9
10 -----
11 ORAL AND VIDEOTAPED DEPOSITION OF

12 DR. RODRIGO CANTU

13 (VIA ZOOM)

14 JULY 16, 2022
15 -----

16 ORAL AND VIDEOTAPED DEPOSITION OF DR. RODRIGO CANTU,
17 produced as a witness at the instance of the DEFENDANT,
18 and duly sworn, was taken in the above-styled and
19 numbered cause on July 16, 2022 from 2:24 o'clock p.m.
20 to 5:40 o'clock p.m., Via Zoom, before
21 DEBBIE S. LONGORIA, CSR in and for the State of Texas,
22 reported by machine shorthand, pursuant to the Federal
23 Rules of Civil Procedure.
24
25

1 THE WITNESS: I don't recall the
2 specifics of the report. I don't want to tell you the
3 wrong answer.

4 Q. (By Ms. Peery) Do you have any evidence that
05:20 5 any of your personal information or passwords were
6 obtained by Digital Forensics Corporation, LLC or
7 Dr. Guerra?

8 MR. EKELAND: Objection. You can answer.

9 THE WITNESS: I don't have anything that
05:20 10 specifically shows Digital Forensics or Sandra have
11 taken my passwords. I don't have a -- I don't have a
12 smoking gun, I guess, if you want to call it that.

13 Q. (By Ms. Peery) Do you have any evidence that
14 your other personal information was taken by Dr. Guerra
05:21 15 or Digital Forensics Corporation?

16 A. My personal information was on the dark web.
17 That was found by the -- by Exhibit A.

18 Q. Your personal information was found on the
19 dark web by Exhibit A?

05:21 20 MR. EKELAND: Objection.

21 THE WITNESS: Correct.

22 Q. (By Ms. Peery) Yes?

23 A. Yes.

24 Q. Okay. Did Exhibit A confirm how your personal
05:21 25 information appeared on the dark web?

1 MR. EKELAND: Objection. You can answer.

2 THE WITNESS: They -- they thought it was
3 stolen by somebody.

4 Q. (By Ms. Peery) Do you have any evidence who
05:22 5 stole your personal information and put it on the dark
6 web?

7 MR. EKELAND: Objection. You can answer.

8 THE WITNESS: I don't -- like I said, I
9 don't have a photo of them taking it. I don't have that
05:22 10 kind of evidence. That's -- I guess that's what I'm
11 using as your -- when you say "evidence," yeah.

12 Q. (By Ms. Peery) Did Exhibit A confirm that
13 Dr. Guerra or DFC obtained your personal information and
14 posted it to the dark web?

05:22 15 MR. EKELAND: Objection. You can answer.

16 THE WITNESS: No.

17 Q. (By Ms. Peery) Did you have any discussions
18 with Spectrum regarding this alleged cable splitter?

19 A. I did not.

05:23 20 Q. What personal knowledge do you have regarding
21 the discovery of the wire splitter and then its
22 subsequent disappearance?

23 MR. EKELAND: Objection. You can answer.

24 THE WITNESS: I discussed it with my
05:23 25 wife. She told me what had happened. She showed me, I

1 myself.

2 Q. (By Ms. Peery) You are alleging a claim
3 against Dr. Guerra for intentional infliction of
4 emotional distress; isn't that right?

05:27 5 A. Yes.

6 Q. Okay. What conduct of Dr. Guerra caused you
7 to suffer severe emotional distress?

8 MR. EKELAND: Objection. You can answer.

9 THE WITNESS: The first thing was
05:27 10 withholding visitation of my children starting in 2018.
11 Then alleging that I physically abused my children in a
12 report to CPS shortly after that. And then hiring
13 Digital Forensics Corporation to monitor us and access
14 our internet and video surveillance system in our home.

05:28 15 Q. (By Ms. Peery) And in your -- in this
16 underlying custody case, you requested documents from
17 Digital Forensic Corporation, correct?

18 MR. EKELAND: Objection. You can answer.

19 THE WITNESS: I believe we did, yes.

05:28 20 Q. (By Ms. Peery) Okay. And I didn't mean to
21 interrupt, if I did. But is that -- is that all the
22 conduct that you allege caused you to suffer severe
23 emotional distress?

24 MR. EKELAND: Objection. You can answer.

05:28 25 THE WITNESS: No, that's not all the

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION

3 MELODY JOY CANTU and DR.)
4 RODRIGO CANTU,)
5 Plaintiffs,)
6 VS.) CIVIL ACTION
7 DR. SANDRA GUERRA and)
8 DIGITAL FORENSICS)
9 CORPORATION, LLC,)
 Defendants.)

11 REPORTER'S CERTIFICATION

12 DEPOSITION OF DR. RODRIGO CANTU

13 JULY 16, 2022

14
15 I, Debbie S. Longoria, Certified Shorthand Reporter
16 in and for the State of Texas, hereby certify to the
17 following:

18 That the witness, DR. RODRIGO CANTU, was duly sworn
19 by the officer and that the transcript of the oral
20 deposition is a true record of the testimony given by
21 the witness;

22 I further certify that pursuant to FRCP Rule 30(f)
23 (1) that the signature of the deponent:

24 _____was requested by the deponent or a party before
25 the completion of the deposition and returned within 30

1 days from date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 X was not requested by the deponent or a party
5 before the completion of the deposition.

6 I further certify that I am neither attorney nor
7 counsel for, related to, nor employed by any of the
8 parties to the action in which this testimony was taken.

9 Further, I am not a relative or employee of any
10 attorney of record in this cause, nor do I have a
11 financial interest in the action.

12 Subscribed and sworn to on this the 28th day
13 of July, 2022.

14

15

16

17

18

19

20

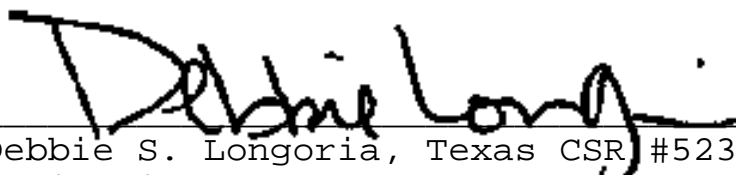
21

22

23

24

25


Debbie S. Longoria, Texas CSR #5232
Expiration Date: 10/31/23
Lexitas - Firm Registration No. 539
100 N.E. Loop 410, Suite 955
San Antonio, Texas 78216
(210) 481-7575